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FILED
08 APR 16 PM 3:42
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY: [signature] DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ASIA AWAD, Plaintiff, v. LIBERTY MUTUAL FIRE INSURANCE COMPANY, RAAD KHALAF and DOES 1 – 30, inclusive, Defendants.	CASE NO.: '08 CV 0696 JM AJB SDSC Case No. 37-2008-00062594-CU-IC-EC **CERTIFICATE OF INTERESTED PARTIES** Complaint Filed: 3/12/08

TO THE COURT AND TO THE PLAINTIFF AND HER ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that the undersigned, legal counsel of record for Defendant Liberty Mutual Fire Insurance Company ("LMFIC"), certifies that the following listed parties have a direct, pecuniary interest in the outcome of this case. These representations are made to enable the court to evaluate possible disqualification or recusal:

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1. While the Complaint does not allege the citizenship of the Plaintiff, LMFIC is informed and believes that the Plaintiff was, at the time of the filing of this action, and still are, residents and citizens of the State of California.

2. Defendant LMFIC was, at the time of the filing of this action, and still is, an Wisconsin corporation incorporated under the laws of the State of Wisconsin. Defendant LMFIC's principal place of business is located in Massachusetts.

3. While the complaint does not alleges KHALIF's citizenship, LMFIC is informed and believes and thereon alleges that KHALIF was, at the time the complaint was filed, as still is a citizen of the State of California for diversity purposes. However, KHALAF was not a contracting party to the relevant insurance policy. In addition, Plaintiff's negligence claim against KHALAF is untenable as a matter of law. Thus, LMFIC has filed contemporaneously with this Petition for Removal, a Motion to Drop KHALAF from this action, pursuant to F.R.C.P. Rule 21, as he is a sham defendant intended to defeat this court's jurisdiction.

DATED: April 16, 2008

BERGER KAHN
A Law Corporation

By: ______________________
DALE A. AMATO
Attorneys for LIBERTY MUTUAL FIRE INSURANCE COMPANY